## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA ALBANY DIVISION

JENNIFER JOHNSON-CAMPBELL, INDIVIDUALLY AND AS ADMINISTRATOR OF THE ESTATE OF CATHY ANN WINDHAM JOHNSON, DECEASED, AND JESSICA TAGNEY, INDIVIDUALLY,

**Plaintiffs** 

v.

WORKHORSE TRUCKS, INC. (WORKHORSE GROUP, INC.)
Serve via Georgia Secretary of State:
VCorp Agent Service, Inc.
4400 Easton Commons Way, Suite 125
Columbus, Ohio 43219,

Defendants.

CIVIL ACTION FILE NO. 1:19-cv-00209

## CORPORATE DISCLOSURE STATEMENT ON BEHALF OF DEFENDANT WORKHORSE GROUP, INC., IMPROPERLY NAMED AS WORKHORSE TRUCKS, INC. (WORKHORSE GROUP, INC.)

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and Rule 87.1 of the Local Rules of the United States District Court for the Middle District of Georgia, notice is hereby given by counsel of record for Defendant Workhorse Group, Inc., improperly named as Workhorse Trucks, Inc. (Workhorse Group, Inc.), a Nevada corporation with its principal place of business in Ohio, that the following are subsidiary corporations of Workhorse Group, Inc.: Workhorse Technologies Inc. (Ohio), Workhorse Motor Works Inc. (Indiana), Workhorse Properties Inc. (Ohio) and Surefly Inc. (Delaware). Each subsidiary is wholly owned by

Workhorse Group Inc., except Surefly, Inc., which is wholly owned by Workhorse Technologies, Inc.

Workhorse Group, Inc. has no parent companies, and there are no publicly traded companies that own 10% or more of Workhorse Group, Inc.'s stock to the best of the undersigned's knowledge and information.

This 19<sup>th</sup> day of November, 2019.

Respectfully submitted,

/s/ Catherine M. Banich
BRYNDA RODRIGUEZ INSLEY
Georgia Bar No. 611435
CATHERINE M. BANICH
Georgia Bar No. 260514

Attorney for Defendant Workhorse Group, Inc., Improperly Named as Workhorse Trucks, Inc. (Workhorse Group, Inc.)

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served a copy of the within and foregoing CERTIFICATE OF INTERESTED PERSONS AND CORPORATE DISCLOSURE STATEMENT ON BEHALF OF DEFENDANT upon all parties to this matter by USDC EFile and by email to the counsel of record as follows:

| Attorney for Plaintiff: |  |
|-------------------------|--|
| Dylan J. Hooper, Esq.   |  |
| Morgan & Morgan, PA     |  |
| P.O. Box 57007          |  |
| Atlanta, GA 30313       |  |
|                         |  |

This 19th day of November, 2019.

Respectfully submitted,

/s/ Catherine M. Banich
BRYNDA RODRIGUEZ INSLEY
Georgia Bar No. 611435
CATHERINE M. BANICH
Georgia Bar No. 260514

Attorney for Defendant Workhorse Group, Inc., Improperly Named as Workhorse Trucks, Inc. (Workhorse Group, Inc.) TAYLOR ENGLISH DUMA LLP 1600 Parkwood Circle Suite 200 Atlanta, Georgia 30339 770-434-6868- Telephone 770-434-7376- Facsimile binsley@taylorenglish.com cbanich@taylorenglish.com